



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 30 2010

EPA Region 5 Records Ctr.



371013

REPLY TO THE ATTENTION OF

MEMORANDUM

SUBJECT: Action Memorandum – Request for funds to initiate a Time-Critical Removal Action at the ESI Environmental Inc Site, Marion County, Indiana (Site Spill ID # B5YS)

FROM: Verneta Simon, On-Scene Coordinator *VS*
Emergency Response Branch II – Removal Section 4

THRU: Linda Nachowicz, Chief *LN*
Emergency Response Branch II

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Memorandum is to request and document your approval to expend up to \$1,548,000 to abate an imminent and substantial threat to public health, welfare, and the environment posed by the abandonment of the ESI facility, which is located at 4910 West 86th Street, Indianapolis, Marion County, Indiana. A release may cause used oils and possibly PCB-contaminated oils to either enter the Indianapolis sewer system or according to the 2006 Facility Response Plan (FRP), Oil creek, which leads to Crooked creek, Lake Sullivan, and then the White River. From 2007 to the present, sewer overflows that impacted residential properties and golf courses were traced back to the ESI facility. It would be reasonable to expect that the same would occur when this property is abandoned, since ESI does not intend to process any sludge prior to abandoning the property. In addition, they also may leave sulfuric acid and/or caustic soda in tanks. Tanks containing sulfuric acid and caustic soda range in size from 3,000 gallons to 10,000 gallons.

The ESI facility is a commercial used oil processing facility that accepts shipments via truck and rail. According to the FRP, there are 12 above storage tanks (ASTs) at the facility with a total oil storage capacity of 1,199,392 gallons. The largest above-ground tank has the capacity of 1.04 million gallons. There are also 3 underground storage tanks (USTs) at the facility with a total oil storage capacity of 1,025,000 gallons. The total above-ground and below ground tank capacity is 2,224,392 million gallons. ESI began operation on or about December 10, 1999.

This time-critical removal action is necessary to mitigate the threats to public health, welfare, and the environment posed by abandoned acids, bases, used oil, and the polychlorinated biphenyls (PCBs) affecting the entire facility. ESI maintains PCBs are only of concern in Tank # 51 (AKA Tank A). U.S. EPA Region 5 Land and Chemicals Division and the Indiana Department of Environment Management believe PCBs may be found in additional tanks. A formal PCB inspection was conducted on September 1, 2010 and the results are still pending.

The proposed removal action involves working with the following agencies: Marion County Health Department (MCHD), Indianapolis Department of Public Works (IDPOW), Indiana Department of Environmental Management (IDEM), and U.S. EPA Region 5 Land and Chemical and Water Divisions. This property was brought to U.S. EPA's attention by IDEM, who had been contacted by the facility and informed of its pending closing and a desire to leave the property in a condition that would not cause additional environmental harm or make a clean-up difficult for IDEM or U.S. EPA. An e-mail dated August 24, 2010, from Mr. Harry Atkinson, IDEM State Clean-up Section Chief to Mr. Charles Gebien, U.S. EPA Response Section 4 Chief, requests U.S. EPA's assistance on this matter. Subsequently, there was a meeting on September 1, 2010, between IDEM, ESI, MCHD, IDPOW, and U.S. EPA, regarding the facility's closure. On September 1, 2010, U.S. EPA conducted a limited site assessment. ESI indicated that it is going to continue to accept used oil until September 28, 2010. The company plans to file for bankruptcy protection on October 1, 2010.

The removal proposed herein is estimated to require 60 on-site working days. The ESI Site is not on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS # INN000510501

As stated above, IDEM contacted U.S. EPA on August 24, 2010, regarding the closing of this facility. On September 1, 2010, U.S. EPA staff from the Superfund and Land and Chemicals Divisions travelled to Indianapolis to meet with MCHD, IDEM, IDPOW, and ESI to determine if a CERCLA removal is warranted and to resolve the PCB issue at this tank farm. Given the past incidents involving the sewer overflow, there is a concern that a sewer overflow could occur once the facility is unmanned. Furthermore, on September 1, 2010, ESI's President, Tom Gawlik estimated about 1.2 million gallons of sludge remained in at least two bunkered tanks. He also stated that there would be some amount of sludge in the remaining tanks at the facility. For the most part, it would be reasonable to conclude that any sludge would have a high metals concentrations and/or possibly PCBs so it is not necessary to prepare an OPA project plan. U.S. EPA's definition of used oil on www.epa.gov/osv/conserve/material/usedoil is as follows:

Used oil is exactly what its name implies: it's any petroleum-based or synthetic that has been used. During normal use, impurities such as dirt, metal scrapings, water or chemicals can get mixed in with the oil, so that in time, the oil no longer performs well. Eventually, this used oil must be replaced with virgin or re-refined oil to do the job correctly. Used oil can contain toxic chemicals and heavy metals.

Data provided by IDEM, IDPOW, and others indicated high metals, total petroleum hydrocarbons (TPH), extended range organics (ERO), and diesel range organics (DRO) and are available in the Administrative Record. The results of the September 1, 2010, Joint Formal PCB inspection are not yet available from U.S. EPA Region V Land and Chemicals Division and IDEM, however, the PCB issue started on July 18, 2007, when ESI was informed by a customer that they had discovered approximately 28 milligrams per kilogram (mg/kg) of PCBs in a used oil shipment from the ESI facility. In correspondence dated July 7, 2010, between ESI's insurance company's environmental consultant, WSP Environment & Energy (WSP), and Mr. Tony Martig, U.S. EPA Region 5 Land and Chemicals Division, it was stated that a majority of the work to remove PCBs from the facility had been completed, except for the decontamination of one of the larger tanks, Tank 51 (AKA Tank A), and the associated piping.

A facility legend and diagram are included on the next two pages. According to the FRP, ESI began operations on or about December 10, 1999, using small temporary storage tanks, with oil being shipped off-site almost as soon as it was produced. Current operations consist of shipments via truck and rail of oily waters, machining coolants, and lubricating oils. Solids are separated after which the oils are removed through the use of API separators and DAF units. The recovered oils are then heat-finished with the use of live steam, pH control, and de-emulsifiers. The separated oil is pumped off, allowed to cool and sold after analysis. The water phase is re-circulated back into the water treatment system. The rag phase is dewatered and, depending on the BTU content, is either sold or solidified as waste for disposal.

R5 Superfund EJ Analysis for the ESI (Ecological Systems) Site

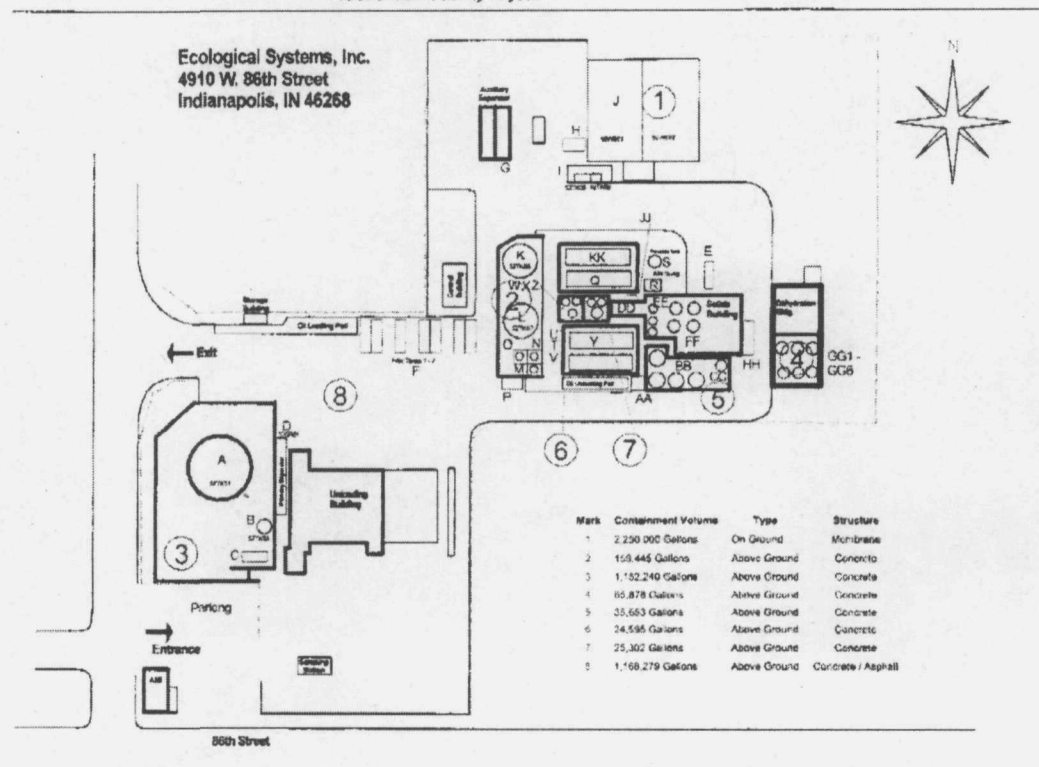
The area surrounding the ESI (Ecological Systems) Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The ESI (Ecological Systems) Site is in a census tract with a score of **1** (Attachment 4). Therefore, Region 5 considers this site to be a high-priority potential EJ area of concern.

ESI Environmental Slug Discharge Prevention Plan

MARK	EQUIP ID	DESCRIPTION	L SPE CIF	CONTAINMENT (SECONDARY/AREA)
A	52TK51	OIL STORAGE TANK	1,000,000 GALLON	SECONDARY
B	52TK50	OIL SKIMMING STORAGE TANK	10,000 GALLON	SECONDARY
C		SAMPLE STORAGE BUILDING		AREA
D	SEP PIT	PRIMARYSEPARATOR	68,000 GALLON	AREA
E	F4	FRAC TANK 4	22,000 GALLON	AREA
F	F1-F7	OFF SPEC OIL STORAGE FRAC TANKS	(7X) 22,000 GALLON	AREA
G	ASP	AUXILIARY SEPARATOR	30,000 GALLON	AREA
H		OIL WATER SEPARATOR	3,000 GALLON	AREA
I	BLDG3	CHEMICAL BUILDING		AREA
J	WEST MMG EAST MMG	RAW WATER STORAGE TANKS	(2X) 1,000,000 GALLON	SECONDARY
K	52TK06	DESMULSIFICATION TANK	90,000 GALLON	SECONDARY
L	52TK07	PRECIPITATION TANK (OUT OF SERVICE)	90,000 GALLON	SECONDARY
M	52TK03	CAUSTIC STORAGE TANK	3,000 GALLON	SECONDARY
N	52TK03A	CAUSTIC STORAGE TANK	3,000 GALLON	SECONDARY
O	52TK02	CAUSTIC STORAGE TANK	10,000 GALLON	SECONDARY
P		FLOCCULANT BUILDING		AREA
Q	52SP01B	API OIL/WATER SEPARATOR	30,000 GALLON	AREA
R		API OIL/WATER SEPARATOR SLUMP	13,000 GALLON	AREA
S	52TK30	HYDROGEN PEROXIDE STORAGE TANK	7,000 GALLON	SECONDARY
	52TK33	CAUSTIC STORAGE TANK	7,000 GALLON	SECONDARY
U	52TK36	CAUSTIC STORAGE TANK	10,000 GALLON	SECONDARY
V	52TK34	CAUSTIC STORAGE TANK	7,000 GALLON	SECONDARY
W	52TK37	SULFURIC ACID STORAGE TANK	10,000 GALLON	SECONDARY
X	52TK38	NOT IN USE	10,000 GALLON	SECONDARY
Y	52SP02A 52SP02B	DAF SEPARATORS	(2X) 30,000 GALLON	AREA
Z	52TK39	SULFURIC ACID STORAGE TANK	7,000 GALLON	SECONDARY
AA		OIL UNLOADING SUMP	4,000 GALLON	
BB	55TK12 - 55TK15	OIL STORAGE TANKS (TYPICAL OF 4)	(4X) 22,000 GALLON	SECONDARY
CC	52TK04	SULFURIC ACID STORAGE TANK	10,000 GALLON	SECONDARY
DD	OX PIT	OXIDATION PIT	30,000 GALLON	AREA
EE	53FL01A - 53FL01C	SAND FILTER (TYPICAL OF 3)	(3X) 2,000 GALLON	AREA
FF	53TK20 - 53TK24	SLUDGE TANK (TYPICAL OF 4)	(4X) 12,000 GALLON	AREA
GG1	55TK41	OFF-SPEC OIL STORAGE TANK	15,000 GALLON	SECONDARY
GG2	55TK42	OFF-SPEC OIL STORAGE TANK	15,000 GALLON	SECONDARY
GG3	55TK43	OFF-SPEC OIL STORAGE TANK	15,000 GALLON	SECONDARY
GG4	55TK44	OFF-SPEC OIL STORAGE TANK	22,500 GALLON	SECONDARY
GG5	55TK45	OFF-SPEC OIL STORAGE TANK	24,000 GALLON	SECONDARY
GG6	55TK46	OFF-SPEC OIL STORAGE TANK	20,000 GALLON	SECONDARY
HH		CENT FEED TANK	22,000 GALLON	AREA
JJ		SMALL AIR STRIPPER	5,000 GALLON	AREA
	52SP01A	LARGE AIR STRIPPER	30,0000 GALLON	AREA

2. Facility Layout – Flow Diagrams

FIGURE 4.2 – Facility Layout



III. THREAT TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the Site may pose an imminent and substantial endangerment to public health or welfare or the environment, based upon factors set forth in the National Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Section 300.415 (b)(2). These conditions include:

- a) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

As shown on the Facility Layout Figure 4.2, tanks containing sulfuric acid and caustic soda which range in size from 3,000 gallons to 10,000 gallons are present on-site. Unrestricted access to the Site could result in an accidental or intentional release of hazardous materials, contact with hazardous materials, or a reaction that generates toxic gases. The close proximity of the Site to residences and other vulnerable areas greatly increases potential threats to human health and the environment if a release occurs. The limited site assessment conducted on September 1, 2010, demonstrated that there were several incidents between 2007 and the present (See Attachment 4), where a release from this facility has caused oily sludge to affect at least 27 residential properties and three golf courses, Coffin Golf Course, Riverside Golf Course, and Riverside Golf Academy. ESI is considered the source because they are the only facility that discharges to the North Belmont POTW. Sampling data in the Administrative Record is a compilation of pre- and post- sampling since 2007 by ESI, ESI's contractor, Keramida, IDPOW, MCHD, and others. Total lead in soil sample results ranged from 124 to 14.6 mg/kg; DRO results ranged from 67,000 to 130,000 mg/kg; and ERO results ranged from 450,000 to 13 mg/kg. The clean-ups performed from 2007 to the present applied IDEM's Risk Integrated System of Closure (RISC), which is 81 mg/kg total lead for residential, 230 mg/kg total lead for commercial, 410 mg/kg total lead for direct contact, 80 mg/kg for both DRO and ERO for residential, and 330 mg/kg DRO and 1000 mg/kg ERP for industrial or commercial. IDPOW has spent \$100,000 to complete the clean-ups in 2007, 2008, 2009, and 2010. It does not appear that any of the regulatory agencies sent confirmatory letters to the affected residences so they do not know any pre or post sample results, and the golf courses performed their own clean-ups. Documentation is also lacking in terms on the conditions after each overflow, excavation and backfilling incident.

- b) Actual or potential contamination of drinking water supplies or sensitive Ecosystems;

ESI's FRP also includes a Vulnerability Analysis (VA). According to the VA if there was a release from a one million gallon tank, there would be a 27-mile plume. Such a release would take the path of least resistance and would first reach the dry ditch that handles storm water run-off from the Marathon-Ashland property, flow into Oil Creek, Crooked Creek, Lake Sullivan, and then the White River. The VA identified water intakes, schools, medical facilities, residential areas, businesses, wetlands, fish and

wildlife, lakes and streams, recreational areas, transportation routes, utilities, and other areas of economic importance and are listed below:

- Water Intakes – The White River is the only navigable body of water with enough flow to warrant withdrawing water from it. According to IDEM's Water Section, there are not any drinking water intakes within 28 miles of the confluence of the Crooked Creek and White River. There are several industrial/utility intakes such as Beveridge Paper Mill, Simkins Industries, Indianapolis Power and Light, Perry K Generation Station, E.W. Stour Generation Station and the White River Basin.
- Schools – There are thirty one schools.
- Hospitals and Medical Facilities – There are five medical facilities.
- Residential Areas – There are numerous developments in the area.
- Businesses – The two primary businesses are the Asphalt Materials and Marathon-Ashland.
- Wetlands - Wetlands are present.
- Fish and Wildlife – The White River contains fishable areas that have edible fish.
- Recreation Areas – On Oil Creek, there are not any defined recreation areas. On Crooked Creek, there is Broodmoor Country Club and Lake Sullivan Golf Course. On the White River, there is an amusement park and soap box derby racetrack.

- c) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

This factor was demonstrated by the various sewer overflow incidents. Maps showing the extent of the sewer overflows are contained in the Administrative Record and in Attachment 3.

- e) The availability of other appropriate Federal or State response mechanisms to respond to the release;

As described in Section II and the Administrative Record, Marion County Health Department, the Indiana Department of Public Works, the Indiana Department of Environmental Management, ESI and U.S. EPA met on September 1, 2010, to discuss closure of the facility and any actions needed. The matter was referred to U. S. EPA to address, as appropriate.

- f) Other situations or factors that may pose threats to public health or welfare of the United States or the environment;

According to NOAA, the annual rainfall is between 40 and 41 inches. Since this facility is predominately concrete, it receives about 228,000 gallons per inch of precipitation. Therefore, there is a lot of clean storm water generated at this facility.

Estimates indicate that one can expect 5.5 inches of rainfall for September and October 2010. Therefore, U.S. EPA should expect 1,254,000 gallons of clean storm water at this facility and conditions ripe for another overflow from ESI.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the contaminants, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Removal activities at this Site will include, but are not limited to the following response activities:

- a. Develop and implement a Site Health and Safety Plan and Site Security Plan;
- b. Secure the Site, as needed, to prevent unauthorized access to hazardous substances and oil in tanks and other containers;
- b. Characterize acids, caustics, waste oil, tank semi-solids (sludges) , and unknown wastes for treatment and/or off-site disposal;
- c. Characterize the extent of PCB contamination in wastes and soils at the Site;
- d. Characterize the extent of contamination at residential properties and the golf courses impacted by past sewer overflows;
- e. Remove properly characterized wastes and contaminated soils for commercial treatment /disposal;
- f. Leave the Site in such a manner that storm water is properly managed and that any remaining contaminants no longer pose a threat to public health, welfare or the environment.

The removal action will be conducted in a manner not inconsistent with the National Contingency Plan (NCP). The OSC has initiated planning for provision of a post-removal Site control consistent with the provisions of Section 300.415 (1) of the

NCP. Elimination of all threats presented is expected to minimize the need for post-removal Site control.

The removal activities are expected to take 60 on-site working days to complete.

An Independent Government Estimate is provided in Attachment 2, a detailed clean-up contractor cost estimate is provided in Attachment 5, and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Regional Removal Allowance Costs

Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, various subcontractors, Notices to Proceed, and Interagency Agreements with other Federal Agencies. Includes a 50% Contingency)	\$1,200,000
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Other Extramural Costs Not Funded from the Regional Allowance

Total START, including multiplier	\$ 90,000
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SUBTOTAL, EXTRAMURAL COSTS	<u>\$1,290,000</u>
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Extramural Costs Contingency (20% of subtotal, Extramural Costs)	\$ 258,000
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TOTAL, REMOVAL ACTION PROJECT CEILING ESTIMATE	\$1,548,000
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The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements (ARARs)

All applicable or relevant and appropriate requirements (ARARs) will be complied with to the extent practicable. Federal ARARs for this Site include, but are not limited to, RCRA. A letter regarding ARARs will be sent to Mr. Harry Atkinson, IDEM

and Mr. Richard Wise, IDPOW. Any responses from IDEM or IDPOW will be added to the Administrative Record.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 CFR § 300.440.

VI. CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or non-action may result in increased likelihood of exposure to caustics, acids, or oily sludge that may be PCB-contaminated.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For Administrative purposes, information concerning confidential enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$2,771,477¹

$$(\$1,548,000 + \$154,800) + (62.76\% \times \$1,702,800) = \$2,771,477$$

IX. RECOMMENDATION

This decision document represents the selected removal action for the ESI (Ecological Systems) Site, Indianapolis, Indiana, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for this Site (Attachment 1). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action. The total estimated project ceiling, if

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery

approved, will be \$1,548,000. Of this, an estimated \$1,458,000 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: Richard C. Ke 9-30-10
Director, Superfund Division Date

DISAPPROVE: _____
Director, Superfund Division Date

ATTACHMENTS: Enforcement Confidential Addendum

1. Index to the Administrative Record
2. Independent Government Cost Estimate
3. Maps showing some incidents in 2007 and 2009
4. Environmental Justice Analysis
5. Detailed Cleanup Contractor Cost Estimate

cc: D. Chung, U.S. EPA, 5203-G

M. Chezick, U.S. Department of Interior, w/o Enf. Addendum

H. Atkinson, Indiana Department of Environmental Management (IDEM), w/o Enf. Addendum

G. Larkin, Indiana State Department of Health, w/o Enf. Addendum

J. Doerflein, Marion County Health Department, w/o Enf. Addendum

M. Johnson, Agency for Toxic Substances and Disease Registry (ATSDR), w/o Enf. Addendum

R. Wise, Indiana Department of Public Works, w/o Enf. Addendum

PAGE 12
BCC PAGE

HAS BEEN REDACTED

**NOT RELEVANT TO THE SELECTION OF THE
REMOVAL ACTION**

PAGE 13
ENFORCEMENT ADDENDUM
ESI INC. (ECOLOGICAL SYSTEMS) SITE
SEPTEMBER 2010

HAS BEEN REDACTED

**NOT RELEVANT TO THE SELECTION OF THE
REMOVAL ACTION**

ATTACHMENT 1

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

ADMINISTRATIVE RECORD FOR ESI ENVIRONMENTAL INC. SITE INDIANAPOLIS, INDIANA

ORIGINAL
SEPTEMBER 2010

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	05/00/95	U.S. EPA	File	Combined Sewer Overflows: Guidance for Nine Minimum Controls (SDMS ID: 375298)	69
2	02/07/06	City of Indianapolis	Ecological Systems, Inc.	Compliance Agreement Docket No. 05-IP-0261 (SDMS ID: 375277)	5
3	08/08/06	City of Indianapolis	Ecological Systems, Inc.	Compliance Agreement Docket No. 06-IP-0276 (SDMS ID: 375276)	10
4	09/29/06	U.S. of America & The State of Indiana	City of Indianapolis	Consent Decree in Connection with the City's Operation of its Municipal Wastewater and Sewer System (SDMS ID: 375299)	119
5	2007-2009			Photographs: Oily Overflow Occurrences onto Private/Public Properties	
6	10/12/09		File	Pretreatment History for Ecological Systems, Inc. (SDMS ID: 375275)	3
7	02/26/10			News Story: "Feds Charge Two Men Accused of Ordering Workers to Flush Contaminated Water" w/Attached Press Release (SDMS ID: 375281)	2
8	07/01/10	Wise, R., City of Indianapolis	Gawlik, T., ESI Environmental, Inc.	Letter re: Transmittal of Attached Revised Notice of Violation Dated June 29, 2010 (SDMS ID: 375278)	11
9	07/07/10	Simon, J. & D. McLay, WSP Environment & Energy	Martig, T., U.S. EPA	Letter re: Revised Tank 51 Restoration Work Plan Application at the ESI Environmental Inc. Site (SDMS ID: 375280)	18

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
10	09/01/10		File	Sign-in Sheet for the September 1, 2010 ESI Closure Plan/Update Meeting (SDMS ID: 375279)	1
11	08/24/10	Gebien, C., U.S. EPA	Atkinson, H., IDEM	E-mail Message re: U.S. EPA Response to IDEM Request For U.S. EPA Assistance in Conducting a Removal Action At the ESI Environmental Inc. Site w/Reply History (SDMS ID: 374389)	4
12	08/31/10		File	FAX Transmittal of ESI Environmental Slug Discharge Prevention Plan and Facility Layout Diagram (SDMS ID: 375282)	2
13				Facility Response Plan for ESI Environmental, Inc.	
14	00/00/00	Simon, V., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for Funds to Initiate a Time-Critical Removal Action at the ESI Environmental, Inc. Site (PENDING)	

PAGE 15
ATTACHMENT 2

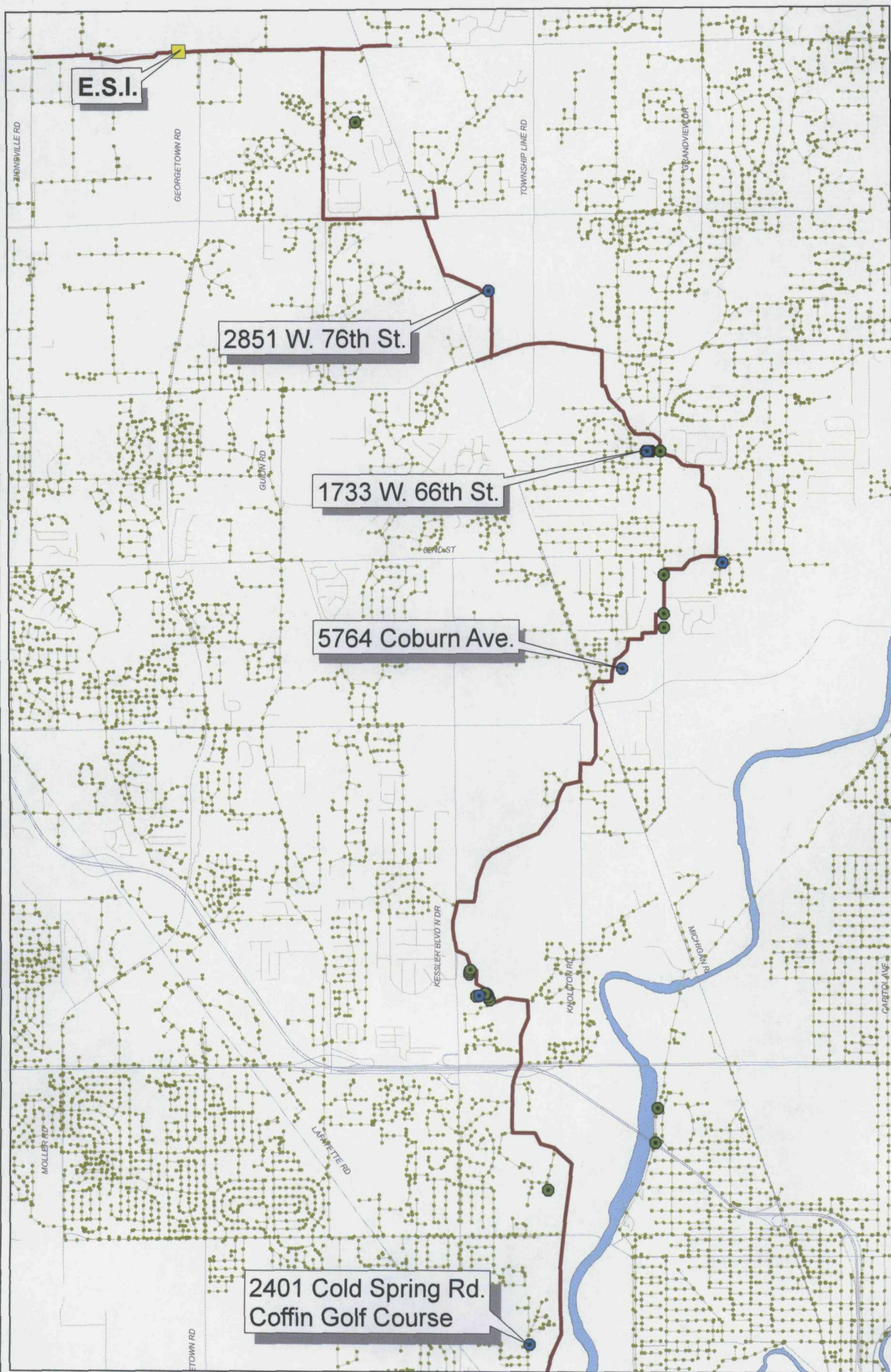
INDEPENDENT GOVERNMENT COST ESTIMATE
ESI INC. (ECOLOGICAL SYSTEMS) SITE
SEPTEMBER 2010

HAS BEEN REDACTED

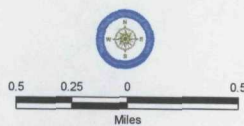
NOT RELEVANT TO THE SELECTION OF THE
REMOVAL ACTION

Marion County Health Department Inspection Sites in 2007 and 2009

Marion County, Indiana



- E.S.I.
- 2009 Properties Impacted
- 2007 Properties Impacted
- Manholes
- Belmont North Interceptor
- Sewer Lines
- Main Street



H
HEALTH &
HOSPITAL
CORPORATION

MC
MARION COUNTY
INDIANA

P:\gis\projects\beh\2010\820142
August 26, 2010

ATTACHMENT 4

Enviromental Justice Analysis

ESI (Ecological Systems) Site Map Showing EJ SEAT Values For Surrounding Area



ATTACHMENT 5

**ESI DISPOSAL COST ESTIMATE
2 PAGES**

HAS BEEN REDACTED

**NOT RELEVANT TO THE SELECTION OF THE
REMOVAL ACTION**